



# Liguori, Morris & Yiengst

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March 9, 2006

The Honorable Kent A. Jordan  
District Court for District of Delaware  
844 N. King Street, Lock Box 10  
Wilmington, DE 19801

**RE: CROTHER ET AL. V. DEWEY BEACH ET AL.**  
**CA NO.:04-913-KAJ**

Dear Judge Jordan,

The undersigned counsel represents the Plaintiffs Theresa Crother, George Green, Gregory A. Parise and Michael Whetstone. The Town of Dewey Beach, Chief of Police Samuel Mackert, Patrolman Zachary Pettyjohn, and Patrolman John Wheatey are represented by Kevin Connors, Esquire.

The current scheduling order has a trial date set for November 20, 2006. The parties are jointly requesting that the scheduling order be amended to allow additional discovery and to push back the Dispositive Motion cutoff date for April 30, 2006. The request is being made because the parties have been extending significant efforts to resolve the cases. The parties still need to complete approximately ten (10) depositions and propose that the new discovery cut off be April 30, 2006 and the Dispositive Motion deadline be set for May 30, 2006. All parties are in agreement with this request and do not wish for the Trial date to be rescheduled unless the Court feels that the trial date can not be kept because of the above-referenced changes to the scheduling order. The Plaintiffs request that the Motion for Summary Judgment filed by Defendants be held in abeyance until the discovery has been completed.

If you have any questions concerning this matter, please do not hesitate to contact counsel for Plaintiffs or Defendants

Very truly yours,  
**LIGUORI, MORRIS & YIENGST**

/s/ James E. Liguori  
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JEL/tlb  
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